1441 Main Street, Suite 300 Columbia, SC 29201



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FLORENCE P. BELSER GENERAL COUNSEL

June 25, 2007

## **VIA EFILING AND HAND DELIVERY**

Mr. Charles L.A. Terreni Chief Clerk/Administrator South Carolina Public Service Commission 101 Executive Center Dr., Suite 100 Columbia, SC 29210

Re:

Petition of Global Connection of South Carolina, Inc. for the Designation as an Eligible

Telecommunications Carrier **Docket No. 2007-172-C** 

Dear Mr. Terreni:

Enclosed for filing please find the original and one (1) copy of the Office of Regulatory Staff's First Continuing Data Request in the above referenced matter. Please date stamp the extra copy enclosed and return it to me in the envelope provided.

Please note that the attached documents are exact duplicates, with the exception of the form of the signature, of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

By copy of this letter we are also serving all other parties of record. Please let me know if you have any questions.

Sincerely.

C. Lessie Hammonds

CLH/pjm Enclosures

cc:

Houssam Abdallah Margaret M. Fox, Esquire M. John Bowen, Jr., Esquire Scott Elliott, Esquire Patrick W. Turner, Esquire

## **BEFORE**

## THE PUBLIC SERVICE COMMISSION OF

## **SOUTH CAROLINA**

## **DOCKET NO. 2007-172-C**

IN RE:	Petition of Global Connection of	)	OFFICE OF REGULATORY
	South Carolina, Inc. for the	)	STAFF'S FIRST CONTINUING
	Designation as an Eligible	)	DATA REQUEST
	Telecommunications Carrier	)	

# TO: Houssam Abdallah, President, Global Connection of South Carolina:

Pursuant to S.C. Code Ann. Sections 58-4-10 and 58-4-50, and 26 S.C. Code Regs. 103-833 (Supp. 2005), the Office of Regulatory Staff hereby serves the following Data Requests upon Global Connection of South Carolina, Inc., (hereafter referred to as "Global" or "the Company").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-833, that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy

of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

## IT IS THEREFORE REQUESTED:

- I. That all information requested below, unless otherwise specified, shall be limited to Global's actual and/or proposed South Carolina operations.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to James McDaniel, of the South Carolina Office of Regulatory Staff.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.
- IX. That Global provide six (6) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that Seven Bridges provide an electronic version of the responses.

- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of Global's responses, the Global witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require Global to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

## **REQUESTS:**

- 1.1 Identify those states where Global has been designated an Eligible Telecommunications Carrier ("ETC") pursuant to § 214(e) of the Telecommunications Act of 1996 and identify by docket or order number the state or federal regulatory decision granting such request.
- 1.2 Identify any states where Global has requested ETC status but was denied.
- 1.3 Identify any states where Global has a pending application for ETC status.
- 1.4 Is the application for ETC status filed with the South Carolina Public Service Commission by Global in this docket comparable to the applications filed in other states? If not, please describe any differences.
- 1.5 Please describe the means by which Global provides telecommunications services in South Carolina. For example, identify whether Global utilizes resale, unbundled network elements, or its own facilities (i.e. not leased from an incumbent local exchange carrier).
- 1.6 If Global utilizes any of its own facilities (i.e. not leased from another carrier), describe those facilities and their location.
- In paragraph 5 of its application, Global states that the Company "offers all of the supported services enumerated under Section 254(c) using facilities obtained as UNEs from Bellsouth, Sprint, and Verizon" and thus the requirement of "facilities" as set forth in Section 214 (e)(1)(A) is satisfied. (A) Does the Company purchase the UNEs under a commercial agreement or pursuant to an interconnection agreement? (B). Please identify the leased portions of the network that the Company purchases from BellSouth, Sprint, and Verizon. (e.g. switching, loop, port, etc.).

June 25, 2007

C. Lessie Hammonds, Esquire

South Carolina Office of Regulatory Staff

1441 Main Street, Suite 300

Columbia, South Carolina 29201

(803) 737-0803

Fax: (803) 737-0895

lhammon@regstaff.sc.gov

#### **BEFORE**

## THE PUBLIC SERVICE COMMISSION

## **OF SOUTH CAROLINA**

## **DOCKET NO. 2007-167-C**

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Petition of Seven Bridges Communications,	)	
LLC for the Designation as an Eligible	)	<b>CERTIFICATE OF</b>
Telecommunications Carrier	)	SERVICE

This is to certify that I, Pamela J. McMullan, have this date served one (1) copy of the **Office of Regulatory Staff's First Continuing Data Request** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Houssam Abdallah , President Global Connection of South Carolina, Incorporated 3957 Pleasantdale Road Atlanta, GA, 30340

> Scott Elliott, Esquire Elliott & Elliott, P.A. 721 Olive Street Columbia, SC, 29205

Margaret M. Fox, Esquire M. John Bowen, Jr., Esquire McNair Law Firm, P.A. Post Office Box 11390 Columbia, SC 29211

Patrick W. Turner, Esquire AT&T South Carolina 1600 Williams Street, Suite 5200 Columbia, SC 29201

Pamela J. McMullan

June 25, 2007 Columbia, South Carolina